

**IN THE UNITED STATES BANKRUPTCY COURT
MIDDLE DISTRICT OF PENNSYLVANIA
(HARRISBURG)**

IN RE:)	
ROGER DALE MOORE AND)	CHAPTER 13
BARBARA ANNE MOORE)	
)	CASE NO. 1:22-bk-02406-HWV
)	
DEBTOR)	JUDGE HENRY W. VAN ECK
)	
US BANK TRUST NATIONAL)	
ASSOCIATION, NOT IN ITS INDIVIDUAL)	
CAPACITY BUT SOLELY AS OWNER)	
TRUSTEE FOR VRMTG ASSET TRUST)	
)	
CREDITOR)	
)	
ROGER DALE MOORE AND BARBARA)	
ANNE MOORE, DEBTORS, AND)	
JACK N ZAHAROPOULOS, TRUSTEE)	
)	
RESPONDENTS)	

CERTIFICATE OF DEFAULT

I, Joshua I. Goldman, Esquire, attorney for Movant, certify that the Debtor has defaulted under the terms of the Stipulation between the parties that was approved by the Court per the Court's Order entered on July 12, 2023 (Document No. 55). It is further certified that the attached Notice of Default dated April 29, 2024, was served upon Debtor's counsel on said date appearing on the notice. Debtor has failed to cure the default subsequent to said notice. Accordingly, per the terms of the Stipulation, the Court shall enter an Order granting Movant relief from the automatic stay. A proposed Order is attached hereto and filed herewith.

DATED this the 18th day of July 2024.

Respectfully submitted,

/s/ Joshua I. Goldman
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Attorney for Movant

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy has been furnished to the parties on the attached Service List by electronic notice and/or by First Class U.S. Mail on this the 18th day of July 2024:

DEBTORS

ROGER DALE MOORE
BARBARA ANNE MOORE
640 DUNKEL SCHOOL RD
HALIFAX, PA 17032-9424

ATTORNEY

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TRUSTEE

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STANDING CHAPTER 13(TRUSTEE)
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ASST. U.S. TRUSTEE

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